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ATTORNEYS FOR PLAINTIFF DR. RALPH S. BEREN, EDD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DR. RALPH S. BEREN, ED.D,

Plaintiff,

v.

BOARD OF TRUSTEES OF
CALIFORNIA STATE UNIVERSITY,
an Entity of the State of California,
CALIFORNIA STATE UNIVERSITY,
an Entity of the State of California,
JACOB E. PEREA, ED.D, an Individual,
in his Individual and Representative Capacities as
Dean of School of Education of California State
University,
NATHAN T. AVANI, PH.D, an Individual,
in his Individual and Representative Capacities as
Chair of Department of Secondary Education of
California State University,
ELK GROVE UNIFIED SCHOOL DISTRICT,
an Entity of the State of California,
KIMI KANEKO, an Individual,
in her Individual and Representative Capacities as
Program Administrator of Elk Grove Unified School
District,
ELIZABETH KANEKO, an Individual,
in her Individual and Representative Capacities as
Supervisor of Elk Grove Unified School District, and
DOES 1-300,

Defendants.

) No. 3:06-CV-04706-MMC

)
) **STIPULATED ORDER FURTHER**
) **EXTENDING DATE FOR RESPONSIVE**
) **PLEADING**

1 Plaintiff and defendants hereby stipulate and agree as follows:

- 2 1) Plaintiff and defendants have engaged in a meet and confer effort regarding the final
3 language of the complaint,
4
5 2) Based on said meet and confer, plaintiff drafted and filed his First Amended Complaint,
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7 3) Defendants have engaged in a meet and confer effort regarding the First Amended
8 Complaint,
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10 4) Plaintiff has agreed to respond to said meet and confer,
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12 5) Plaintiff and defendants agree to the following time table:
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14 a) Plaintiff shall consider said meet and confer and respond, in writing, by 2006
15 December 18th,
16
17 b) Defendants shall consider said response and further respond, in writing, by 2006
18 December 22nd,
19
20 c) Plaintiff shall consider said response and further respond, in writing, by 2006
21 December 26th,
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23 d) Defendants shall consider said response and further respond, in writing, by 2006
24 December 30th, and
25
26 e) If plaintiff determines that a further amendment is necessary, plaintiff shall file his
27 Second Amended Complaint by 2007 January 8th and defendants shall have twenty
28 (20) days to respond thereto. If plaintiff determines that no amendment is necessary,
29 plaintiff shall so notify defendants on 2007 January 8th and defendants shall have
30 twenty days to respond.

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1 SO STIPULATED.

2 Dated: 2006 December 14

3 /s/Philip Steven Horne, Esq.
4 Philip Steven Horne, Esq.
5 LAW OFFICES OF PHILIP STEVEN HORNE, ESQ.
6 ATTORNEYS FOR PLAINTIFF BEREN

7 /s/Lisa Plank-Schwartz, Esq.
8 Lisa Plank-Schwartz, Esq.
9 WRIGHT, ROBINSON, OSTHIMER & TATUM
10 ATTORNEYS FOR CALIFORNIA STATE
11 UNIVERSITY DEFENDANTS

12 /s/Michael W. Pott, Esq.
13 Michael W. Pott, Esq.
14 PORTER, SCOTT, WEIBERG & DELEHANT
15 ATTORNEYS FOR ELKGROVE DEFENDANTS

16 SO ORDERED.

17 2006 December 18

18 
19 The Honorable Maxine M. Chesney
20 JUDGE OF THE UNITED STATES DISTRICT COURT
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